

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :	:	CRIMINAL NO. _____
	:	
v. :	:	DATE FILED: _____
	:	
ROBERT VLADO,	:	VIOLATIONS: 18 U.S.C. § 1341
a/k/a “Michael Hurley,”	:	(mail fraud-5 counts);
a/k/a/ “Tom Morris,”	:	42 U.S.C. § 408(a)(7)(B) (false
a/k/a/ “Walter Trade,”	:	use of a social security number-
a/k/a/ “David Dunn”	:	6 counts);
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNTS ONE THROUGH FIVE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The following insurance companies provided car insurance (collectively referred herein as “the insurance companies”):

a. Amica Mutual Insurance Company, located at 100 Amica Way, Lincoln, Rhode Island 02865.

b. Allied Mutual Insurance Company, located at 1100 Locust St. Des Moines, Iowa 50391-1100.

c. Sentry/Dairyland Insurance Company, located at 1800 North Point Drive, Stevens Point, Wisconsin 54481.

d. Guaranty National Insurance Company-Med James Inc., located at P.O. Box 2014, Shawnee Mission, Kansas 66201.

e. Electric Insurance Company, located at 75 Sam Fonzo Drive, Beverly,

Massachusetts 01915.

f. The Windsor Group, located at Tampa, Florida.

g. Quincy Mutual Fire Insurance Company, located at 57 Washington Street,
Quincy, Massachusetts 02169.

h. GEICO General Insurance Company, located at One GEICO Plaza,
Washington, DC 20076.

i. AIG Insurance Company, located at 3 Beaver Valley Road, Wilmington,
Delaware 19803.

THE SCHEME

2. From at least in or around at least January 2000, to in or around May 2000,
defendant

ROBERT VLADO,
a/k/a “Michael Hurley,”
a/k/a/ “Tom Morris,”
a/k/a/ “Walter Trade,”
a/k/a/ “David Dunn,”

devised and intended to devise a scheme to defraud the insurance companies, and to obtain money and property of the insurance companies by means of false and fraudulent pretenses, representations, and promises.

It was a part of the scheme that:

3. Defendant fraudulently obtained car insurance policies over the telephone and then, in a matter of days, submitted fraudulent insurance claims to obtain payment from the listed insurance companies. In each instance, defendant ROBERT VLADO submitted a claim for a car

accident that never happened. The fictitious claims had many or all of the following identical characteristics: (1) the police were allegedly always called, but never showed up, (2) all the policies had been in effect for only a matter of days, (3) the insured cars were never available for inspection because they had been discarded as total losses, (4) the appraisals were always unattended by the claimant, (5) the home addresses of the insured drivers were always commercial mail drops or were otherwise undeliverable, (6) none of the accidents involved passengers or injuries, (7) there were never any witnesses, (8) the insured drivers never purchased collision insurance, (9) all of the phone numbers provided by the insured and claimants were for pagers or answering machines.

AMICA MUTUAL INSURANCE COMPANY

4. On or about March 27, 2000 defendant ROBERT VLADO applied for and obtained automobile insurance, policy number 910315-1006, from Amica Mutual Insurance Company in the name of an alias “Tom Morris.”

5. On or about April 4, 2000, defendant ROBERT VLADO, posing as “Tom Morris,” falsely reported an accident involving “Tom Morris” and “Michael Hurley” of 2520 Welsh Road, Philadelphia, Pennsylvania. “Michael Hurley” is also an alias used by defendant VLADO, and 2520 Welsh Road is a commercial mail facility where defendant VLADO rented a mailbox in the names of “Tom Morris” and “Michael Hurley.” Defendant VLADO used a New Jersey boat license in the name of “Tom Morris” with a photograph of defendant VLADO as identification to rent the mailbox.

6. Defendant ROBERT VLADO, using the alias “Tom Morris,” falsely reported to Amica Mutual Insurance Company that he had been in a car accident, and that he, “Tom Morris,”

had hit “Michael Hurley” at the intersection of Roosevelt Boulevard and Byeberry Road in Philadelphia at 10:00 p.m. Defendant VLADO further falsely reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

7. Defendant ROBERT VLADO, posing as “Michael Hurley,” submitted claim number L262000 1990 to Amica Mutual Insurance Company for approximately \$5,950 for alleged damage to his 1984 Mercedes Benz.

8. Defendant ROBERT VLADO caused Amica Mutual Insurance Company to issue a check to “Michael Hurley” in the amount of approximately \$5,950 and have it delivered to Hurley’s address at 2520 Welsh Road on or about May 19, 2000.

9. On or about May 22, 2000, defendant ROBERT VLADO arrived at 2520 Welsh Road, accessed the mailbox rented in the name of “Tom Morris” and “Michael Hurley,” and claimed the \$5,950 check issued by Amica Mutual Insurance Company to “Michael Hurley.”

SENTRY/DAIRYLAND INSURANCE COMPANY

10. On or about March 24, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number 1403938 73 KS, from Dairyland Insurance Company in the name of an alias “Michael Hurley.”

11. On or about April 4, 2000, defendant ROBERT VLADO, posing as “Michael Hurley,” falsely reported an accident involving “Michael Hurley” and “Tom Morris” of 2520 Welsh Road, Philadelphia, Pennsylvania. “Tom Morris” is also an alias used by defendant VLADO, and the address at 2520 Welsh Road is a commercial mail facility where defendant VLADO rented a mailbox in the names of “Tom Morris” and “Michael Hurley.” Defendant

VLADO used a New Jersey boat license in the name of “Tom Morris” with a photograph of defendant VLADO as identification to rent the mailbox.

12. Defendant ROBERT VLADO, using the alias “Tom Morris,” falsely reported to Dairyland Insurance Company that he had been in a car accident, and that he, “Michael Hurley,” had hit “Tom Morris” at the intersection of Roosevelt Boulevard and Byeberry Road in Philadelphia at 10:00 p.m. Defendant VLADO, posing as “Michael Hurley,” further falsely reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

13. Defendant ROBERT VLADO, posing as “Tom Morris,” submitted claim number 18 A 771086 to Dairyland Insurance Company for approximately \$5,675 for alleged damage to his 1984 Mercedes Benz.

ALLIED MUTUAL INSURANCE COMPANY

14. On or about March 27, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number, AXD 0009758307, from Allied Mutual Insurance Company in the name of an alias “Tom Morris.”

15. On or about April 4, 2000, defendant ROBERT VLADO , posing as “Tom Morris,” falsely reported an accident involving “Tom Morris” and “Michael Hurley” of 2520 Welsh Road, Philadelphia, Pennsylvania. “Michael Hurley” is also an alias used by defendant VLADO, and the address, under the alias “Michael Hurley,” at 2520 Welsh Road is a commercial mail facility where defendant VLADO rented a mailbox in the names of “Tom Morris” and “Michael Hurley.” Defendant VLADO used a New Jersey boat license in the name of “Tom Morris” with a photograph of defendant VLADO as identification to rent the mailbox.

16. Defendant ROBERT VLADO, using the alias “Tom Morris,” falsely reported to Allied Mutual Insurance Company that he had been in a car accident, and that he, “Tom Morris,” had hit “Michael Hurley” at the intersection of Roosevelt Boulevard and Byeberry Road in Philadelphia at 10:00 p.m. Defendant VLADO further falsely reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

17. Defendant ROBERT VLADO, posing as “Michael Hurley,” submitted claim number 26D57538 to Allied Mutual Insurance Company for approximately \$7,950 for alleged damage to his 1984 Mercedes Benz.

18. On or about April 17, 200, defendant ROBERT VLADO caused Allied Mutual Insurance Company to issue a check number 472017309 to “Michael Hurley” in the amount of approximately \$7,950 and have it delivered to Hurley’s address at 2520 Welsh Road.

19. In or around April of 2000, defendant ROBERT VLADO purchased a white 1984 Rolls Royce Silver Spur for \$20,000 from Gullwing Motor Cars, Inc. in Long Island, New York. Defendant VLADO negotiated the \$7,950 check issued by Allied Mutual Insurance Company to “Michael Hurley” as a down payment. At the time of purchase, defendant VLADO presented Gullwing Motor Car, Inc. with a New York driver’s license, number 253 537 521, in the name of “Bob Kenny Vlado” containing a photograph of defendant VLADO.

MED JAMES/GUARANTY NATIONAL INSURANCE COMPANY

20. On or about March 24, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number, MFP84867, from Guaranty National Insurance Company and Med James, Inc., in the name of an alias “Tom Morris.”

21. The diver's license number provided to Guaranty National Insurance Company and Med James, Inc. by defendant ROBERT VLADO on the insurance application for "Tom Morris" was identical to the number on the New Jersey boat license containing a photograph of defendant VLADO, used to rent the mailbox at 2520 Welsh Road, Philadelphia, Pennsylvania.

22. On or about April 21, 2000, defendant ROBERT VLADO, posing as "Tom Morris," falsely reported an accident involving "Tom Morris" of 7201 20th Avenue, New York, New York, and "Walter Trade" of 7201 20th Avenue, New York, New York, a commercial mail facility. "Walter Trade" is also an alias used by defendant VLADO.

23. Defendant ROBERT VLADO, using the alias "Tom Morris," falsely reported to Guaranty National Insurance Company and Med James, Inc. that he had been in a car accident on April 16, 2000, and that he, "Tom Morris," had hit "Walter Trade" at a location in Woodside, New York, at 10:00 p.m. Defendant VLADO further falsely reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

24. Defendant ROBERT VLADO, posing as "Walter Trade," submitted a claim pursuant to file number LFN0011183 to Guaranty National Insurance Company and Med James, Inc. for \$4,554 for alleged damage to his 1991 Cadillac Deville.

25. On or about May 8, 2000, defendant ROBERT VLADO caused Claims Professional, Inc. to issue check number 003297 to "Walter Trade" in the amount of approximately \$4,554.56 and have it delivered to "Walter Trade's" address at 51-11 Broadway, Apt. 117, Woodside, New York.

26. On or about May 22, 2000, defendant ROBERT VLADO arrived at 2520 Welsh

Road, accessed the mailbox rented in the name of “Tom Morris” and “Michael Hurley” and claimed the \$5,950 check issued by Amica Mutual Insurance Company to “Michael Hurley,” and carried the original \$4,554 check number 003297 issued to “Walter Trade” in a van defendant VLADO drove.

ELECTRIC INSURANCE COMPANY

____27. On or about February 4, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number 6113924A1, from Electric Insurance Company in the name of an alias “Michael Hurley.”

28. On or about February 14, 2000, defendant ROBERT VLADO, posing as “Michael Hurley,” falsely reported an accident involving “Michael Hurley” and “Tom Morris” of 2520 Welsh Road, Philadelphia, Pennsylvania. “Tom Morris” is also an alias used by defendant VLADO and the address at 2520 Welsh Road is a commercial mail facility where defendant ROBERT VLADO rented a mailbox in the names of “Tom Morris” and “Michael Hurley.” Defendant VLADO used a New Jersey boat license in the name of “Tom Morris” with a photograph of defendant VLADO as identification to rent the mailbox.

29. Defendant ROBERT VLADO, using the alias “Tom Morris,” falsely reported to Electric Insurance company that he had been in a car accident, and that he, “Michael Hurley,” had hit “Tom Morris” at the intersection of Cottman Avenue and Castor Avenue in Philadelphia at 10:00 p.m. Defendant VLADO, posing as “Michael Hurley,” further falsely reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

30. Defendant ROBERT VLADO, posing as “Tom Morris,” submitted claim number

6113924A1004655 to Electric Insurance Company for approximately \$6,214.19 for alleged damage to his 1990 Lincoln Town Car.

THE WINDSOR GROUP

31. On or about February 7, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number 123 0661586 00 64, from the Windsor Group in the name of an alias “Michael Hurley.”

32. On or about February 17, 2000, defendant ROBERT VLADO, posing as “Michael Hurley,” falsely reported an accident involving “Michael Hurley” and “Tom Morris” of 2520 Welsh Road, Philadelphia, Pennsylvania. “Tom Morris” is also an alias used by defendant VLADO, and the address at 2520 Welsh Road is a commercial mail facility where defendant VLADO rented a mailbox in the names of “Tom Morris” and “Michael Hurley.” Defendant VLADO used a New Jersey boat license in the name of “Tom Morris” with a photograph of defendant VLADO as identification to rent the mailbox.

33. Defendant ROBERT VLADO, using the alias “Tom Morris,” falsely reported to the Windsor Group that he had been in a car accident, and that he, “Michael Hurley,” had hit “Tom Morris” at the intersection of 9th Avenue and 14th Street, New York, New York, at 10:00 p.m. Defendant VLADO, posing as “Michael Hurley,” further falsely reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

34. Defendant ROBERT VLADO, posing as “Tom Morris,” submitted claim number 009-00-201807FX to the Windsor Group for approximately \$4,503.50 for alleged damage to his 1992 Cadillac Deville, vehicle identification number 1C6CD53B1N4335573.

QUINCY MUTUAL FIRE INSURANCE COMPANY

35. On or about January 22, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number R38 472069-7, from the Quincy Mutual Fire Insurance Company in the name of “Richard Finton.”

36. On or about January 31, 2000, defendant ROBERT VLADO, posing as “Richard Finton,” falsely reported an accident involving “Richard Finton” and “Angelina Kaplan” of 2012 Avenue M, New York, New York. “Angelina Kaplan” was allegedly driving a 1992 Cadillac Deville, vehicle identification number 1C6CD53B1N4335573. This is the same car that defendant VLADO, posing as “Tom Morris,” claimed \$4,503.50 for an alleged accident on February 17, 2000.

37. Defendant ROBERT VLADO, posing as “Richard Finton,” falsely reported to the Quincy Mutual Fire Insurance Company that he had been in a car accident, and that he, “Richard Finton,” had hit “Angelina Kaplan” in New York at 10:00 p.m. Defendant VLADO, posing as “Richard Finton,” further reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

38. Defendant ROBERT VLADO, posing as “Angelina Kaplan,” submitted claim number 00A112774JLR to Quincy Mutual Fire Insurance Company for approximately \$8,085 for alleged damage to a 1992 Cadillac Deville, vehicle identification number 1C6CD53B1N4335573.

GEICO GENERAL INSURANCE COMPANY

39. On or about March 24, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number 55194800, from GEICO General Insurance

Company in the name of B. V., defendant VLADO's wife.

40. On or about February 4, 2000, defendant ROBERT VLADO, posing as B. V., falsely reported an accident that allegedly occurred on or about February 3, 2000, involving B. V. and "Tom Morris" of 2520 Welsh Road, Philadelphia, Pennsylvania. "Tom Morris" is also an alias used by defendant VLADO, and the address at 2520 Welsh Road is a commercial mail facility where defendant VLADO rented a mailbox in the names of "Tom Morris" and "Michael Hurley." Defendant VLADO used a New Jersey boat license in the name of "Tom Morris" with a photograph of defendant VLADO as identification to rent the mailbox.

41. Defendant ROBERT VLADO, using his wife's name, B. V., falsely reported to GEICO General Insurance Company that B. V. had been in a car accident, and that on February 3, 2000 B. V. had allegedly hit "Tom Morris" at the intersection of Linford and Vincent Streets in Philadelphia at 10:00 p.m. Defendant VLADO further falsely reported that the accident was B. V.'s fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

42. Defendant ROBERT VLADO, posing as "Tom Morris," submitted claim number 014421888 0101 014 to GEICO General Insurance Company for approximately \$5,384 for alleged damage to his 1993 Ford Taurus.

43. On or about February 28, 2000, defendant ROBERT VLADO caused GEICO General Insurance Company to issue check number N55018270 to "Tom Morris" and have it mailed to him at 2520 Welsh Road, Philadelphia, Pennsylvania, for approximately \$5,384. On or about March 2, 2000, check number N550182770 in the amount of \$5,384 was endorsed and cashed.

AIG INSURANCE COMPANY

44. On or about January 13, 2000, defendant ROBERT VLADO applied for and obtained automobile insurance, policy number 538-38-49, from AIG Insurance Company in the name of an alias “David Dunn.”

45. On or about January 25, 2000, defendant ROBERT VLADO, posing as “David Dunn,” falsely reported a car accident, involving “David Dunn” and “Tom Morris” of 2412 Steinway Street, New York, New York. “Tom Morris” is also an alias used by defendant VLADO.

46. The title of the 1990 Lincoln Town that was allegedly hit by “David Dunn” and owned by “Tom Morris” lists the same New Jersey boat license number that is on the license used by defendant VLADO to rent the mailbox at the commercial mail facility at 2520 Welsh Road in the name of “Tom Morris.”

47. Defendant ROBERT VLADO, posing as “David Dunn,” reported to AIG Insurance Company that he had been in a car accident, and that on January 25, 2000 he had hit “Tom Morris” at the intersection of at the intersection of 9th Avenue and 14th Street, New York, New York at 8:00 or 9:00 p.m. Defendant VLADO, posing as “David Dunn,” further reported that the accident was his fault, there were no injuries, there were no passengers in either car, and that, although the police were called, they did not respond.

48. Defendant ROBERT VLADO, posing as “Tom Morris,” submitted claim number 00024753 to American International Group Claims Service, Inc. for approximately \$3,510 for alleged damage to his 1990 Lincoln Town Car.

49. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendant

ROBERT VLADO,
a/k/a “Michael Hurley,”
a/k/a/ “Tom Morris,”
a/k/a/ “Walter Trade,”
a/k/a/ “David Dunn,”

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon the following insurance documents for accidents that never occurred:

COUNTS	DATE	MAILING	TO	FROM
1	2/28/00	Check	Tom Morris 2520 Welsh Rd. Philadelphia, PA	GEICO Insurance 1 GEICO Blvd. Fredericksburg, VA
2	3/15/00	Check	Tom Morris 2520 Welsh Road Philadelphia, PA	Windsor Group Tampa, FL
3	4/21/00	Check	Michael Hurley 2520 Welsh Rd. Philadelphia, PA	Allied Mutual Ins. Urbandale, IA
4	4/28/00	Title Certificate	Amica Mutual Insurance Company	Michael Hurley 2520 Welsh Rd. Philadelphia, PA
5	5/3/00	General Release	Amica Mutual Insurance Company	Michael Hurley 2520 Welsh Rd. Philadelphia, PA

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS SIX THROUGH ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 48 of Counts One through Five are incorporated here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

**ROBERT VLADO,
a/k/a “Michael Hurley,”
a/k/a/ “Tom Morris,”
a/k/a/ “Walter Trade,”
a/k/a/ “David Dunn,”**

for the purpose of obtaining a benefit for himself, that is, automobile insurance and automobile insurance claim proceeds from the insurance companies listed below, and with intent to deceive, falsely represented various social security numbers to be the social security number assigned to him and others, when in fact, none of those numbers was the social security number assigned by the Commissioner of Social Security to him and such other persons, as follows:

COUNTS	INSURANCE COMPANY	NAME USED	DATE	POLICY NUMBER/ CLAIM NUMBER	SOCIAL SECURITY NUMBERS
6	Amica	Michael Hurley	4/4/00	L262000 1990	xxx-xx-4187
7	Dairyland	Michael Hurley	4/4/00	1403938 73 KS	xxx-xx-5871
8	Dairyland	Tom Morris	4/4/00	18 A 771086	xxx-xx-6817
9	Allied Mutual	Tom Morris	4/4/00	AXD 0009758307	xxx-xx-4187
10	Electric	Michael Hurley	2/14/00	611392A1	xxx-xx-1186

11	AIG	David Dunn	1/25/00	538-38-49	xxx-xx-9936
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All in violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney